

1 THE HONORABLE JAMES L. ROBART  
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IN THE UNITED STATE DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

9 ANNA PATRICK, DOUGLAS MORRILL,  
10 ROSEANNE MORRILL, LEISA GARRETT,  
11 ROBERT NIXON, SAMANTHA NIXON,  
12 DAVID BOTTONFIELD, ROSEMARIE  
BOTTONFIELD, TASHA RYAN,  
13 ROGELIO VARGAS, MARILYN DEWEY,  
14 PETER ROLLINS, RACHAEL ROLLINS,  
15 KATRINA BENNY, SARA ERICKSON,  
16 GREG LARSON, and JAMES KING,  
individually and on behalf of all others  
similarly situated,

17 Plaintiffs,

18 v.

19 DAVID L. RAMSEY, III, individually;  
20 HAPPY HOUR MEDIA GROUP, LLC, a  
Washington limited liability company; THE  
21 LAMPO GROUP, LLC, a Tennessee limited  
liability company,

22 Defendants.

Case No. 2:23-cv-00630- JLR

STIPULATED MOTION AND [PROPOSED]  
ORDER REGARDING CLASS  
CERTIFICATION DEADLINES

Noted: February 20, 2024.

24 Plaintiffs Anna Patrick, Douglas Morrill, Roseanne Morrill, Leisa Garrett, Robert Nixon,  
25 Samantha Nixon, David Bottonfield, Rosemarie Bottonfield, Tasha Ryan, Rogelio Vargas,  
26 Marilyn Dewey, Peter Rollins, Rachel Rollins, Katrina Benny, Sara Erickson, Greg Largson, and

STIPULATION AND [PROPOSED] ORDER REGARDING  
CLASS CERTIFICATION DEADLINES – PAGE 1  
Case No. 2:23-cv-00630-JLR

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1 James King (“Plaintiffs”) and Defendants David L. Ramsey III and the Lampo Group, LLC  
 2 (“Lampo Defendants”) and Happy Hour Media Group, LLC (“Happy Hour”) (collectively, the  
 3 “Parties”), hereby STIPULATE and AGREE, and so jointly move the Court, as follows:

4 WHEREAS, the Court issued an Order on December 8, 2023 (Dkt. No. 54), setting the  
 5 following deadlines:

- 6 • Deadline for motions relating to admissibility of experts on issues pertaining to class  
  certification: July 11, 2024
- 7 • Deadline for dispositive motions or motions to compel arbitration that any party  
  believes are likely to affect class certification: July 11, 2024
- 8 • Deadline to complete discovery on class certification (not to be construed as a  
  bifurcation of discovery): 30 days after expert motions and dispositive motions or  
  motions to compel arbitration affecting class certification are decided by the Court
- 9 • Deadline for Plaintiffs to file motion for class certification (noted on the fourth Friday  
  after filing and service of the motion pursuant to Local Rules W.D. Wash. LCR 7(d)(3)  
 10 unless the parties agree to different times for filing the response and reply  
  memoranda): 60 days after expert motions and dispositive motions or motions to  
  compel arbitration affecting class certification are decided by the Court
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15 WHEREAS, the Parties have conferred and agree that good cause exists to extend these  
 16 deadlines, given the complexity of legal and factual issues and the discovery necessary prior to the  
 17 foregoing motions, including the need to add intervening case deadlines regarding expert  
 18 disclosures pertaining to class certification;

19 WHEREAS, the Parties agree that the Court should set the following deadlines at this stage  
 20 of litigation:

- 21 • Deadline for Plaintiffs’ disclosure of experts upon whom they may rely in connection  
  with class certification: August 16, 2024
- 22 • Deadline for Defendants’ disclosure of experts upon whom they may rely in connection  
  with class certification: October 4, 2024
- 23 • Deadline for Plaintiffs’ disclosure of rebuttal experts upon whom they may rely in  
  connection with class certification: October 25, 2024
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- 1     • Deadline for motions relating to admissibility of experts on issues pertaining to class  
certification: January 10, 2025
- 2     • Deadline for dispositive motions or motions to compel arbitration that any party  
believes are likely to affect class certification: January 10, 2025
- 3     • Deadline for responses or oppositions to motions relating to admissibility of experts on  
issues pertaining to class certification and/or dispositive motions or motions to compel  
arbitration that any party believes are likely to affect class certification: February 10,  
2025
- 4     • Deadline for replies regarding motions relating to admissibility of experts on issues  
pertaining to class certification and/or dispositive motions or motions to compel  
arbitration that any party believes are likely to affect class certification: February, 28  
2025

5                 WHEREAS, the Parties further agree that the following deadlines should remain in effect,  
6     as ordered (*see* Dkt. No. 54):

- 7     • Deadline to complete discovery on class certification: 30 days after expert motions and  
dispositive motions or motions to compel arbitration affecting class certification are  
decided by the Court;
- 8     • Deadline for Plaintiffs to file motion for class certification: 60 days after expert motions  
and dispositive motions or motions to compel arbitration affecting class certification  
are decided by the Court.

9                 THEREFORE, the Parties stipulate and jointly move the Court for an order setting the  
10    deadlines as set forth above.

1 STIPULATED TO this 20<sup>th</sup> day of February, 2024.

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26 STIPULATION AND [PROPOSED] ORDER REGARDING  
CLASS CERTIFICATION DEADLINES– PAGE 4  
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1                   **[PROPOSED] ORDER**

2                   IT IS SO ORDERED.

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4                   DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

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7                   THE HONORABLE JAMES L. ROBART  
8                   UNITED STATES DISTRICT JUDGE

9                   Presented by:

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33                  STIPULATION AND [PROPOSED] ORDER REGARDING  
34                  CLASS CERTIFICATION DEADLINES– PAGE 5  
35                  Case No. 2:23-cv-00630-JLR

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